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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 14-0306 WHA
	)	
Plaintiff,	)	STIPULATION TO EXCLUDE TIME AND
	)	<del>PROPOSED</del> ORDER
v.	)	
	)	
LUKE D. BRUGNARA,	)	
	)	
Defendant.	)	
_____	)	

The United States, by its undersigned counsel, and defendant, by his undersigned counsel, hereby stipulate to and memorialize the following findings:

On February 25, 2015, the parties appeared before this Court for a hearing. The government was represented by Assistant United States Attorneys Robin Harris and Ben Kingsley, and defendant was present and represented by new attorney Jeffrey Bornstein and by attorney, Erik Babcock. At this hearing, the Court again took notice of the very high likelihood that Mr. Babcock has been conflicted out of the case because he is a witness to defendant's absconding from the federal building on February 5, 2015. The Court continued the case until March 17, 2015, for a status conference, and tentatively set a trial date of April 27, 2015.

STIPULATION TO EXCLUDE TIME AND ~~PROPOSED~~ ORDER  
CR 14-0306 WHA

1 With the agreement of the parties and based on the representations of defense counsel, the Court  
 2 excluded time under the Speedy Trial Act from February 25, 2015 to March 17, 2015, finding that the  
 3 ends of justice outweighed the best interests of the public and the defendant in a speedy trial, to allow  
 4 for the effective preparation of new defense counsel, taking into consideration the exercise of due  
 5 diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), 3161(h)(7)(B)(iv).

6 **IT IS SO STIPULATED.**

7 DATED: March 2, 2015

/s/  
 ROBIN L. HARRIS  
 BENJAMIN KINGSLEY  
 Assistant United States Attorneys


9 DATED: March 2, 2015

/s/  
 JEFFREY BORNSTEIN  
 Counsel for Defendant Luke Brugnara

12 A status conference is set for March 17, 2015. The time from February 25, 2015, until March  
 13 17, 2015, is excluded under the Speedy Trial Act to allow defendant effective preparation of counsel,  
 14 taking into consideration the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A),  
 15 3161(h)(7)(B)(iv). The ends of justice served by granting a continuance outweigh the best interests of  
 16 the public and defendant of a speedy trial.

17 **IT IS SO ORDERED.**

18 DATED: March 3, 2015.

  
 HON. WILLIAM ALSUP  
 UNITED STATES DISTRICT JUDGE